

United States District Court, New Mexico District

Pete V. Domenici United States Courthouse

313 Lomas Blvd NW Suite 630

Albuquerque NM 87102

Re: Shiloff v Thompson et al, 20-CV-01164-KK-CG

11-30-20  
**FILED**  
UNITED STATES DISTRICT COURT  
ALBUQUERQUE, NEW MEXICO

DEC 02 2020

MITCHELL R. ELFERS  
CLERK /mg

Hon. Kirtan Khalsa:

My name is Paul Thompson. I am being sued for 28:1332 Diversity – Libel. I have reason to believe that the law firm representing the defendant is using illegal tactics in their attempt to sue. I am a poor, single father of two special needs children and I am, so far, representing myself.

Due to the Thanksgiving holiday and the COVID restrictions imposed by my state, county, and city, I have not been able to secure representation before the 21-day complaint response period. I am writing to request an extension to provide enough time to secure representation and build my defense.

I would also like to ask for a summary judgement in my favor or a dismissal of the case. This case is brought against Paul Thompson (myself) and Jane Doe Thompson. I am not now, and never have been, married. Fabrication of defendants is a clear abuse of the law. There are a number of other inconsistencies in the filing, including point 10, "Defendant appears to be a producer of EDM (Electronic Dance Music) and aspires to compete with the Plaintiff". Again, I am not now nor have I ever been a "producer of EDM". I am also accused of being "guided by evil motives" (line 46). As far as my understanding, "evil" is not legal terminology and its use shows a severe misunderstanding and disrespect for the law.

The attorney and his firm in question, Daniel R Warner, Kelly / Warner Law, was just released from a 2 year ban from his home state of AZ, where they were convicted of, among other things, fabrication of defendants. His ban ended 2 weeks before he attempted the same illegal actions against me.

The Kelly / Warner firm is well-known for their shady and illegal practices. In an effort to disallow any similar illegal action taking place against me, I ask again for the case to be ruled in my favor or dismissed outright. If that cannot be done, please provide an extension so that I may be able to obtain counsel.

Facts relating to the Kelly / Warner firm's disreputable and illegal practices can be viewed on multiple reputable sites:

<https://usaheald.com/az-bar-places-aaron-kelly-daniel-warner-2-years-probation/>

<https://www.techdirt.com/articles/20180130/10000039119/bar-complaint-filed-against-lawyers-who-participated-bogus-lawsuits-targeting-fake-defendants.shtml>

<https://www.washingtonpost.com/news/volokh-conspiracy/wp/2017/03/30/libel-takedown-injunctions-and-fake-notarizations/>

Thank you for your time and consideration. I can be reached as follows:

Paul Thompson

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505-604-6912

pthompsonmail@gmail.com

Thompson  
804 C Chavez Park Blvd NW  
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Hon. K. Tan Khalifa  
District Court NM  
333 Lomas Blvd NW  
Albuquerque NM 87102

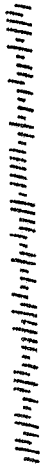
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